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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION  
FOR LEAVE TO SUPPLEMENT ITS  
TRIAL WITNESS LIST (DKT. 2304)**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Motion for Leave to Supplement Its Trial Witness List (Dkt. 2304).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Motion	Blue highlights on page 6

3. The blue highlights on page 6 of Waymo's Motion contain highly confidential information regarding Uber's specific numbers relating to financial resources and hypothetical strategic business considerations. This information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to acquire insight into Uber's financial resources and business strategy, allowing competitors to tailor their own business strategy to the detriment of Uber.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Motion and supporting exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of December, 2017 at San Francisco, California.

/s/ Thomas J. Pardini

Thomas J. Pardini